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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

In the matter of:

Case No.: 6:19-cv-01071-AA

: James-Brent: Alvarez.,
an individual,

PLAINTIFF'S SECOND MOTION FOR
EXTENSION OF TIME TO REPLY TO
DEFENDANT'S RESPONSE TO
PLAINTIFF'S OBJECTIONS AND MOTION
FOR RECONSIDERATION

v.

Luke Sitts, an individual;
Geri Brooks, an individual;
Scott Geeting, an individual;
Steven Barrett, and individual;
Don Morris, an individual;
Matthew Carmichael, an individual;
Michael H. Schill, an individual,

Defendants.

LR 7-1 CERTIFICATION

Plaintiff certifies that he conferenced by phone and email with council for Defendant's on the matter's herein and Defendant's take no position on the matter.

MOTION

In accordance with Fed. R. of Civ. P. 6(b), and without waiver of any rights, Plaintiff, respectfully, moves the Court for an order extending the deadline to file a response to Defendant's Motion to Strike Plaintiff's Objections and Motion for Reconsideration. Specifically, Plaintiff requests an extension of five (5) days. Current deadline for is November 20, 2020, and proposed deadline is November 25, 2020.

MEMORANDUM

This motion is made in good faith and not for the purpose of delay. Plaintiff, lost his internet connection for a day and has had no phone service since the 18th of November, 2020. Defendant's sent Plaintiff a communication November 20, 2020 to conference on November 23, 2020, or November 24, 2020, about his Motion for Leave to Amend his Objection's and Motion for Reconsideration.

This is a second-request for an Extension of Time to Reply to Defendant's Motion to Strike Plaintiff's Objection's Motion for Reconsideration. Plaintiff does not anticipate needing further time than the requested five (5) days. This will allow for the conference between the parties to take place regarding the Plaintiff's Motion for Leave to Amend his Objection's and Motion for Reconsideration, and, allow plaintiff to consider defendant's feedback before his files his pleading.

CONCLUSION

For the reasons stated above, Plaintiff respectfully requests the Court issue an order extending the deadline to file his reply in the above matter.

DATED this 20th day of November, 2020.

THE PLAINTIFF.

s/: James-Brent: Alvarez. UCC 1-308
: James-Brent: Alvarez.

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Plaintiff's Motion for Extension of Time on:

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Attorneys for Defendants
Luke Sitts, et al.

by the following indicated method of service set forth below:

Email: as agreed on by all parties involved during the Covid-19 situation, until either party terminates the agreement.

DATED this 20th day of November, 2020.

s/James-Brent: Alvarez UCC 1-308
James-Brent: Alvarez
c/o 30924 Kenady Lane
Cottage Grove, Oregon [97424]